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December 19, 2005

Nebraska Technology & Telecommunications, Inc.
2308 S. 156th Circle
Omaha, NE 68130

Federal Communications Commission
Office of the Secretary
445- 12th Street, SW
Room TW-A325
Washington, DC 20554

RE: Docket 96-45

RECEIVED

FEB 16 2006

To Whom It May Concern:

I am filing this letter to petition for a waiver with the Federal Communications Commission (FCC) for Nebraska Technology & Telecommunications, Inc.'s Interstate Access Support Line Count due June 30, 2004 for the period ended March 31, 2004.

Federal Communications Commission
Office of the Secretary

Nebraska Technology & Telecommunications, Inc. (NTT) was granted the status of Eligible Communications Carrier by the State of Nebraska on October 4, 2001. It was brought to our attention that NTT would be eligible for USF and were directed to contact NECA to determine what steps need to be taken to receive USF support. I contacted Lori Terraciano at NECA for our High Cost Support. She sent me an email dated November 4, 2002 with some basic information on the certifications and filings that must be submitted for High Cost Support. I have attached a copy of this email.

This email had all of the different programs that make up USF. My knowledge of these programs was very limited. The only information I had was the email and directions from Lori Terranciano, so my thought was that I was filing for USF – Loop counts because we are a CLEC, and we actually purchase the Loop from Qwest, so it seemed reasonable to me. Per this email under the USF loop counts it has due dates for 9/30, 12/30, 3/30 and 7/31.

When it came time to file our line count, I had marked my calendar with the above due dates. I was informed that NTT would be filing for IAS and was forward the Interstate Access Support Line Count Sample letter. I did not reference the email after I filed for the first time believing I had all of the information needed to complete NTT's required filings.

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I filed NTT's December 31, 2003 IAS Line Count on March 24, 2004. When I went to file NTT's March 31, 2004 IAS Line Count on July 25, 2004, I realized that this was the wrong due date and should have filed by June 30, 2004. After discussing this with the president of NTT on August 2, 2004, we decided to file the Line Count at that time.

NTT is asking for a waiver for the March 31, 2004 Interstate Access Support Line Count not being received by June 30, 2004.

Respectfully submitted,

Gwen M. Sullivan

Gwen Sullivan

From: Lori Terraciano [lterrac@neca.org]
Sent: Monday, November 04, 2002 2:51 PM
To: Gsullivan@nttservices.com
Subject: High Cost information

Good Afternoon Gwen,

Based on our telephone conversation earlier this afternoon, please fax over the pertinent pages of your UNE agreement with Qwest. My fax number is 973-560-4441. Below is some basic information on the certifications and filings that must be submitted to be eligible for High Cost support.

Federal High Cost is made up of the following programs: High Cost Loop Support (HCL), Local Switching Support (LSS), Long term Support (LTS), Interstate Access Support (IAS), Interstate Common Line Support (ICLS). HCL, LSS and LTS together are known as USF.

In order to be eligible to receive USF and IAS support, the following certifications must be submitted:


USF State Certification Requirement - Each state must submit a certification to USAC on 10/1 of every year stating which companies are being certified and that the support that the companies receive will be used only for the provision, maintenance, and upgrading of facilities and services for which support is intended. The following schedule will help you determine when a company is eligible to receive support based on the date that their certification is filed with USAC:

Filed on or before 10/1 - eligible for support for all four quarters of the succeeding year
Filed on or before 1/1 - eligible for support for the 2nd, 3rd and 4th quarters
Filed on or before 4/1 - eligible for support for 3rd and 4th quarters
Filed on or before 7/1 - eligible for support for 4th quarter
Filed after 7/1 - not eligible for support in the current year

More information on the 10/1 certifications can be found on the USAC website: <http://www.universalservice.org/hc/rtf/certreq.asp>.

IAS Certification Requirement - Companies must submit a certification the first time they file for IAS and then every 6/30. This certification must state that the company agrees to use their support only for the provision, maintenance, and upgrading of facilities and services for which support is intended. More information on the IAS certifications can be found on the USAC website:
<http://www.universalservice.org/hc/overview/ias.asp>.

The following are the filings that are required for competitors to be eligible to receive USF or IAS support:

 USF - Loop counts must be submitted for each ILEC study area that the competitor competes in according to the followings schedule:

End of Period 3/31 is due 9/30 of the same year and will be used to calculate support for 1st quarter of the following year (i.e. EOP 3/31/02 is due 9/30/02 and will be used for support in 1Q03).

End of Period 6/30 is due 12/30 of the same year and will be used for support in 2nd quarter of the following year (i.e. EOP 6/30/02 is due 12/30/02 and will be used for support in 2Q03).

This is the section I thought NTT qualified for when 1st receiving this information.

End of Period 9/30 is due 3/30 of the following year and will be used for support in the 3rd and 4th quarters of the current year (i.e. EOP 9/30/02 is due 3/30/03 and will be used for support in 3Q03 and 4Q03).

End of Period 12/31/02 is due 7/31 of the following year and will be used for support in the 1st quarter of the following year (i.e. EOP 12/31/02 is due on 7/31/03 and will be used for support in 1Q04).

IAS - must submit line count data for each ILEC study area that they complete in according to the following schedule:

End of Period 6/30 is due 9/30 of the same year and is used to calculate support for 4th quarter of the current year (i.e. EOP 6/30/02 is due 9/30/02 and will be used for support in 4Q02).

End of Period 9/30/02 is due 12/30 of the same year and will be used to calculate support in the 1st quarter of the following year (i.e. EOP 9/30/02 is due 12/30/02 and will be used to calculate support in 1Q03).

End of Period 12/31 is due 3/31 of the following year and will be used to calculate support in 2nd quarter of the current year (i.e. EOP 12/31/02 is due 3/31/03 and will be used for support in 2Q03).

End of Period 3/31 is due 6/30 of the same year and will be used to calculate support in 3rd quarter of the current year (i.e. EOP 3/31/03 is due 6/30/03 and will be used for support in 3Q03).

Please note that only competitors who serve in a Price Cap serving area are eligible for IAS support.

ICLS - This fund is administered outside of our company. The customer service number for ICLS is 866-204-4257. Only competitors that serve lines in a rate of return service area who is currently receiving ICLS support are eligible. Filings for ICLS are due 7/31, 9/30, 12/30 and 3/30 each year.

For more information on High Cost in general, please visit the USAC website: <http://www.universalservice.org/hc/>.

Please let me know if you have any questions or if I may be of further assistance.

Thank you,

Lori S. Terraciano
National Exchange Carrier Association
Manager - High Cost Program Support
973-560-4426 (phone)
973-560-4434 (fax)